

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

-----X

In re:  THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,  as representative of  THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,  Debtors. <sup>1</sup>	PROMESA Title III  Case No. 17 BK 3283-LTS  (Jointly Administered)
--	---

-----X

**OBJECTION OF INTERNATIONAL UNION, UAW  
AND SERVICE EMPLOYEES INTERNATIONAL UNION  
TO THIRD REVISED PROPOSED CONFIRMATION ORDER**

International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (UAW) (“UAW”) and Service Employees International Union (“SEIU”) object as follows to the November 12, 2021 *Order and Judgment Confirming Modified Eighth Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.* [Docket Entry #19,188, at Exhibit A] (“Third Revised Confirmation Order”). UAW and SEIU file this objection pursuant to paragraph 3 of the Court’s November 12, 2021 *Amended Order Directing*

---

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

*Supplemental Briefing and Oral Argument on Issues Pertaining to the Confirmation Hearing*

[Docket Entry # 19,179], and do so solely to preserve their prior confirmation order objections.<sup>2</sup>

For the instant objection, UAW and SEIU incorporate by reference and re-assert by this filing, as to the Third Revised Confirmation Order, all of their objections to earlier iterations of the proposed confirmation order, as set forth in the October 15, 2021 *Objection of Service Employees International Union to Plan of Adjustment and Proposed Confirmation Order* [Docket Entry #18,511], the October 19, 2021 *Objection of International Union, UAW to Plan of Adjustment and Proposed Confirmation Order* [Docket Entry #18,558], and the November 11, 2021 *Objection of International Union, UAW and Service Employees International Union to Second Revised Confirmation Order* [Docket Entry # 19, 162].

UAW and SEIU reserve all rights in connection with this filing, including the right to supplement or modify it in light of any subsequent modifications to the proposed plan of adjustment or confirmation order.

---

<sup>2</sup> SEIU is a member of the Official Committee of Unsecured Creditors (“Committee”). SEIU submits this objection in its individual capacity and not in its capacity as a Committee member, nor in any way on behalf of the Committee.

November 15, 2021

**COHEN, WEISS AND SIMON LLP**

By: /s/ Peter D. DeChiara

Richard M. Seltzer (*pro hac vice*)

Peter D. DeChiara (*pro hac vice*)

Marie B. Hahn (*pro hac vice*)

[rseltzer@cwsny.com](mailto:rseltzer@cwsny.com)

[pdechiara@cwsny.com](mailto:pdechiara@cwsny.com)

[mhahn@cwsny.com](mailto:mhahn@cwsny.com)

900 Third Avenue, Suite 2100

New York, NY 10022-4869

(212) 563-4100

**MONSERRATE SIMONET & GIERBOLINI**

/s/ Miguel Simonet Sierra

Miguel Simonet Sierra

USDC # 210101

101 San Patricio Ave., Suite 1120

Guaynabo, PR 00968

Tel.: (787) 620-5300

*Counsel to International Union, UAW and  
Service Employees International Union*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 15th day of November 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF System, which will notify all counsel of record, and I also caused a copy to be mailed or emailed, as provided in the Court-approved Case Management Procedures.

/s/ Marie B. Hahn

Marie B. Hahn